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Attorney for Defendant  
*Costco Wholesale Corporation*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DANIELA CANALES POCASANGRE,  
individually,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,  
a Delaware Corporation; DOE EMPLOYEES  
I through X; DOES I through XV, and ROE  
Corporations I through X, inclusive,

Defendants.

CASE NO. 2:24-cv-00667-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND REMAINING DISCOVERY  
DEADLINES (FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED to by all parties, by and through their counsel, that pursuant to LR II 26-3, that the discovery cut off and some of the related deadlines in this matter be extended for sixty (60) days from its current deadlines based upon good cause and good faith as follows:

**A. Discovery Completed To Date:**

1. The Plaintiff presented her FRCP 26(a)(1) Initial Disclosures of Documents and Witnesses on May 7, 2024;

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2. The Plaintiff presented her FRCP 26(a)(1) First Supplement to Initial Disclosures of Documents and Witnesses on June 3, 2024;
3. The Plaintiff presented her FRCP 26(a)(1) Second Supplement to Initial Disclosures of Documents and Witnesses on July 14, 2024;
4. The Plaintiff presented her FRCP 26(a)(1) Third Supplement to Initial Disclosures of Documents and Witnesses on September 17, 2024;
5. The Plaintiff presented her FRCP 26(a)(1) Fourth Supplement to Initial Disclosures of Documents and Witnesses on January 15, 2025;
6. Defendant presented its FRCP 26(a)(1) Initial Disclosures of Documents and Witnesses on April 17, 2024;
7. Defendant presented its FRCP 26(a)(1) First Supplement to Initial Disclosures of Documents and Witnesses on April 29, 2024;
8. Defendant presented its FRCP 26(a)(1) Second Supplement to Initial Disclosures of Documents and Witnesses on August 6, 2024;
9. Defendant presented its FRCP 26(a)(1) Third Supplement to Initial Disclosures of Documents and Witnesses on October 3, 2024;
10. Defendant presented its FRCP 26(a)(1) Fourth Supplement to Initial Disclosures of Documents and Witnesses on October 18, 2024;
11. Defendant presented its FRCP 26(a)(1) Fifth Supplement to Initial Disclosures of Documents and Witnesses on October 28, 2024;
12. Defendant presented its FRCP 26(a)(1) Sixth Supplement to Initial Disclosures of Documents and Witnesses on November 7, 2024;

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13. Defendant presented its FRCP 26(a)(1) Seventh Supplement to Initial Disclosures of Documents and Witnesses on December 26, 2024;
14. Defendant presented its FRCP 26(a)(1) Eighth Supplement to Initial Disclosures of Documents and Witnesses on January 10, 2025;
15. Defendant presented its FRCP 26(a)(1) Ninth Supplement to Initial Disclosures of Documents and Witnesses on February 11, 2025;
16. Plaintiff propounded Interrogatories and Requests for Production of Documents and Defendant has responded;
17. Defendant propounded Interrogatories and Requests for Production of Documents and Plaintiff responded;
18. Defendant served a First Supplemental Responses to Requests for Production of Documents on November 7, 2024;
19. The deposition of Plaintiff was taken on January 10, 2025;
20. The deposition of Plaintiff's spouse, Jesse Martin, was taken on August 28, 2024;
21. Defendant has requested records from:
  - Advantage Chiropractic and Rehabilitation Center
  - Arizona Wellness Group
  - Burn Boot Camp
  - Desert Radiology Solutions
  - Hand and Stone
  - Iconic Mystery Box
  - Las Vegas Integrated Medicine
  - Las Vegas Radiology
  - Mom Docs
  - Nevada Pain Center
  - RVC Fitness, LLC
  - Shadow Emergency Physicians
  - Sizzler
  - Summerlin Hospital and Medical Center
  - Vanguard

**B      Discovery That Remains To Be Completed:**

1. Depositions of some of Plaintiff's medical providers/experts;
2. Depositions of Defendant's experts and additional employees;
3. Plaintiff may take the deposition of Defendant's ex-employee, Richard Pawlasek;
4. Plaintiff has set the deposition of Defendant's expert, Dr. Jeffrey Wang, for March 7, 2025;
5. Plaintiff has set the deposition of Defendant's employee, Ricardo Rimada, for March 17, 2025;
6. Plaintiff has set the deposition of Defendant's employee, Margaret Iayana, for March 17, 2025;
7. Defendant will obtain medical records from the newly discovered medical providers; and
8. Defendant may redepose the Plaintiff on the newly disclosed medical treatment.

**C.      Reasons Why Discovery Was Not Completed:**

The parties have worked diligently in conducting discovery. However, it was difficult to set and take the recent deposition of the Plaintiff and multiple defense witness depositions have had to be reset due to scheduling difficulties and Plaintiff's Counsel's recent physical injury.

In addition, during the recent deposition of the Plaintiff it was learned that Plaintiff has additional medical providers who were not even known to her own attorney until the day of her deposition, leaving open the likelihood that she will be redeposed on the newly discovered and ongoing medical care.

Also, expert depositions have not been considered until recently due to the delay with taking depositions of the defense witnesses.

**Proposed Schedule for Completing Discovery:**

	<b>Current Date</b>	<b>Proposed Date</b>
Last day to amend or add	January 7, 2025	Closed
Initial expert disclosures	February 6, 2025	Closed
Rebuttal expert disclosures	March 7, 2025	May 6, 2025
Discovery cut off	April 7, 2025	June 6, 2025
Dispositive Motions	May 7, 2025	July 7, 2025
Pre-Trial Order	June 6, 2025	August 5, 2025

DATED this 25<sup>th</sup> day of February, 2025.DATED this 25<sup>th</sup> day of February, 2025.

OLSON CANNON &amp; GORMLEY

MUSLUSKY LAW

*/s/ Michael A. Federico, Esq.**/s/ Adam L. Muslusky, Esq.*\_\_\_\_\_  
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Attorneys for Defendant

Attorney for Plaintiff

*Costco Wholesale Corporation**Daniela Canales Pocasangre*

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*Canales v. Costco*

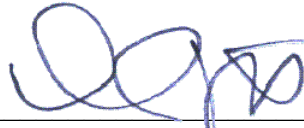
Case No. 2:24-cv-00667-APG-DJA

Stipulation and Order to Extend Remaining Discovery Deadlines (First Request)

**ORDER**

IT IS HEREBY ORDERED that the deadlines in the above-captioned matter  
be extended as follows:

	<b>Date</b>
Last day to amend or add	Closed
Initial expert disclosures	Closed
Rebuttal expert disclosures	May 6, 2025
Discovery cut off	June 6, 2025
Dispositive Motions	July 7, 2025
Pre-Trial Order	August 5, 2025



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 2/26/2025

Submitted by:

OLSON CANNON &amp; GORMLEY

/s/ Michael A. Federico, Esq.

MICHAEL A. FEDERICO, ESQ.

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Attorney for Defendant

*Costco Wholesale Corporation*